

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

DECLARATION OF JIA RYU

I, Jia Ryu, hereby declare pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of my personal knowledge and belief:

1. I am an attorney at Oppenheim + Zebrak, LLP, and am admitted to practice law in the District of Columbia, among other jurisdictions.
2. I submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion for Leave to Take Additional Third-Party Depositions, which is filed contemporaneously herewith.
3. On February 22, 2019, Plaintiffs produced to Defendants an Excel file (bates numbered Plaintiffs_00286281) with four data tabs corresponding to separate data sets for four Peer-to-Peer protocols, each tab identifying specific audio files by hash, title, artist, album, and other fields of information. Each tab contains a data column titled "audible_magic_info_id."
4. On March 4, 2019, the RIAA produced a written report by Harbor Labs titled "Evaluation of the MarkMonitor AntiPiracy System" dated March 3, 2014 (bates numbered RIAA_00127789).

5. On March 4, 2019, the RIAA produced a written report by Stroz Friedberg titled "Independent Expert Assessment of MarkMonitor AntiPiracy Methodologies," dated November 1, 2012 (bates numbered RIAA_00127791).

6. On April 2, 2019, Defendants and their expert Nick Feamster conducted an in-person inspection of MarkMonitor's source code.

7. True and correct copies of the following exhibits are attached to Plaintiffs' Memorandum in Opposition to Defendants' Motion to Compel:

- A. Deposition Subpoena served by Defendants to Audible Magic Corporation, dated April 16, 2019.
- B. Excerpt of Transcript of January 25, 2019 Hearing, filed February 1, 2019 (ECF No. 93).
- C. Deposition Subpoena served by Defendants to MarkMonitor Inc., dated April 10, 2019.
- D. Deposition Subpoena served by Defendants to RIAA, dated April 16, 2019.
- E. Deposition Subpoena served by Defendants to Victoria Sheckler, dated April 16, 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 15, 2019 in Washington, District of Columbia.

/s/ Jia Ryu